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WESPAC FOUNDATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RONEN HELMANN,
Plaintiff,

v.

CODEPINK WOMEN FOR PEACE, et
al.,
Defendants.

Case No.: 3:24-cv-05704-SVW-PVE

**STIPULATION TO ACCEPT
SERVICE AND ACCEPT RESULT
OF WESPAC'S MOTION IN
RELATED CASE**

IT IS HEREBY STIPULATED AND AGREED, pursuant to L.R. 7-1 and subject to the approval of the Court, by and between Plaintiff RONEN HELMANN ("Plaintiff") and Defendant WESPAC Foundation ("Defendant" or "WESPAC", and together, the "Parties") by and through their respective attorneys, that:

1. Plaintiff filed his Second Amended Complaint on December 19, 2024 (Dkt. 70);

2. Defendant agrees herein to accept service of the Second Amended Complaint;
3. Defendant filed a motion to dismiss the First Amended Complaint in the related case in this Court, *Pollak v. CodePink*, et al., No. 24-cv-06253. That motion is fully briefed;
4. The issues in both complaints and cases are functionally equivalent;
5. It would conserve judicial resources for the Parties in this case to abide by the results of WESPAC Foundation's motion to dismiss in *Pollak v. CodePink*, et al., without separate or additional briefing in this case;
6. If Defendant's Motion to Dismiss in *Pollak* is granted, Plaintiff's Second Amended Complaint against Defendant in this case shall be dismissed, and Defendant shall not be required to respond to the Second Amended Complaint.
7. If Defendant's Motion to Dismiss in *Pollak* is denied, the deadline for Defendant to respond to the Second Amended Complaint subsequently shall be determined by the Parties, with the approval of the Court.

Dated: January 24, 2025

JAVITCH LAW OFFICE

By: /s/ Mark L. Javitch
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Attorney for Plaintiff
RONEN HELMANN

1 Dated: January 24, 2025

HERBST LAW PLLC

2 /s/ Robert L. Herbst

3 Robert L. Herbst

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9 Attorneys for Defendant

10 WESPAC Foundation

11 **NON-FILER SIGNATURE ATTESTATION**

12 I, Mark L. Javitch, hereby attest that concurrence in the filing of this document has
13 been obtained from the above signatory.

14 Dated: January 24, 2025

15 /s/ Mark L. Javitch

16 Mark L. Javitch